

Senate Bill No 980 Comments

- Section 682C (1)(A) The vehicle is operate with at least 1 flashing, rotating, or oscillating yellow or amber light that is clearly visible in a 360-degree arc from a distance of 500 feet when in use.

Comments: Should adopt a requirement not based on visibility, but based on candle power or lumens.

Visibility is affected by conditions.

- Section 682C (1)(B) The vehicle is operated with a reverse signal alarm audible above the surrounding noise level or the vehicle is backed up only when an observer signals that it is safe to do so.

Comments: This requirement does not solve anything. It will be an added cost of \$250-\$500 per unit for commercial snow contractors.

The audible alarm is not guaranteed to work properly once it becomes filled with snow.

The audible alarm will prohibit the contractor from being able to work in various municipalities that have noise ordinances.

If you allow the alarm to be turned off during late evening and morning hours, you are increasing the liability to the contractor if he fails to turn the alarm on during operating hours. This could just be overlooked for a short period due to the contractor not watching the clock, and heaven forbid something happens; now the contractor is negligent.

Senate Bill No 980 Comments(continued)

Comments: The audible alarms are very beneficial on construction sights, inside stores to alert retail customers, and inside plants, to name a few. However, we are talking about structured parking lots, where individuals should look both ways before stepping off the curb to cross potential traffic, or leaving their car to enter into potential traffic. A parking lot is not like a construction sight, where an individual does not know what possible direction the traffic flow will come from.

The majority of plow/salt events take place before consumer or employee traffic arrives on sight. The audible alert will not be heard by anyone, except maybe the neighbors.

- Section 682C (3) (A) “Commercial snow removal vehicle” means a vehicle equipped with a plow or other device that is used to remove snow and ice for payment or other remuneration.

Comments: Does this bill effect only commercial snow removal vehicles used for payment or other remuneration? Why are municipalities, school districts, self-performed industrial complexes and private individuals excluded? A snow plow is a snow plow regardless of how it’s utilized.

- We must ask ourselves...”What are we trying to solve? Are we making a mountain out of a mole-hill? You need to redefine the light requirement to be consistent with MDOT terminology and do away with the audible alarm, as it will not accomplish anything positive.

CURBCO SERVICES

<u>Type of account</u>		<u>Residential Area?</u>
Industrial-	9 accounts	yes- 2
Airport-	2 accounts	no
Municipality-	2 accounts	yes- 2
Banks-	20 accounts	yes- 13
Malls-	5 accounts	yes- 1
Schools-	9 accounts	yes- 9
Churches-	4 accounts	yes- 4
Office-	5 accounts	yes- 1
Retail stores-	15 accounts	yes- 5
Subdivisions-	7 accounts	yes- 7
Utility Company-	2 accounts	no
Apartment Bldg.-	1 account	yes- 1